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Subject: Environmental Defense comments on 6-tert-butyl-3-(chloromethyl)-2,4-xylenol (CAS# 23500-79-0)

(Submitted via Internet 10/31/03 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, MTC@mchsi.com, and Patricia.Vernon@cytec.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for 6-tert-butyl-3-(chloromethyl)-2,4-xylenol (CAS# 23500-79-0).

Cytec Industries, in response to the HPV Challenge, has submitted a Robust Summary/Test Plan for 6-tert-butyl-3-(chloromethyl)-2,4-xylenol (CAS# 23500-79-0, trade name A-1846) that describes background information, available data and testing needs for this compound. With the exception of the fact that much of the information that should be in the Introduction of the Test Plan is presented in Appendix A, the Test Plan submitted for A-1846 is a well-organized summary of the limited data available on this chemical.

According to information provided in Appendix A of the Test Plan, this chemical is produced and used in a single plant under closed conditions. Appendix A also indicates that strict measures of industrial hygiene are enforced during production to prevent possible exposure to a potent carcinogen, bis-chloromethyl ether (BCME), that is formed as a byproduct during the synthesis of A-1846. These measures should effectively limit exposure to the relatively nontoxic A-1846 as well. Thus, we agree that, assuming these practices are used, human and environmental exposure to A-1846 arising from production should be very limited.

Nevertheless, the products in which A-1846 is used are not described in the Test Plan or the Robust Summary. Information characterizing the residual amounts, if any, of A-1846 present in finished products should be included in the Introduction of the Test Plan. And given the potent carcinogenicity of its synthetic byproduct, BCME, information regarding residual amounts of this compound in the finished products ? which is not included at all -- should also be included in the Introduction to the Test Plan.

Finally, we agree with Cytec's proposal to conduct appropriate studies to address each of the SIDS elements not currently addressed for A-1846. Specific comments and suggestions follow.

Specific Comments:

1. It should be made clear that data listed as available for Ecotoxicity in the Test Plan Matrix are limited to computer model estimations.

2. The last sentence under section 4.2.3 appears to pertain to a chemical, thiodipropionitrile, not addressed by the current submission.

3. We agree that new studies of reproductive toxicity are not required for A-1846. We would point out, however, that data on possible reproductive toxicity might readily be obtained if the reproductive organs are examined in the proposed repeat dose toxicity studies. Since this data can be obtained without the use of additional animals, we recommend that the reproductive organs be examined in the proposed repeat dose toxicity studies.

Thank you for this opportunity to comment.

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